

June 23, 2000

MEMORANDUM

TO: Stephen West
Regional Administrator
Boise Regional Office

FROM: Zach Klotovich
Air Quality Engineer
State Technical Services Office

THROUGH: Daniel Salgado
Lead Process Engineering
State Technical Services Office

SUBJECT: T2-000052, Woodgrain Millwork, Inc., Nampa (84458)
Technical Analysis for Proposed Tier II Operating Permit No. (#027-00060), Baghouse Pressure Drop Specifications

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 16.01.01 Sections 404.04 (*Rules for the Control of Air Pollution in Idaho*) (*Rules*) for Tier II Operating Permits.

PROJECT DESCRIPTION

This project is for the issuance of an amended Tier II Operating Permit (OP) for Woodgrain Millwork's facility located in Nampa. The most recent operating permit was issued September 25, 1998, but this permit was superseded by a PTC issued on January 19, 1999 that contained all of the applicable requirements of the operating permit. The result of this project will be the issuance of a Tier II permit that supersedes the PTC issued January 19, 1999. The emissions sources affected by the amendment are: System 5, System 8, and System 1.

The extent of the project includes changing the language in Section 2.2 of System 5, System 8, and System 1 to read: "The pressure drop across the baghouse shall be maintained in accordance with manufacturer's and O&M Manual's specifications. Documentation of the manufacturer's and O&M Manual's specifications shall remain on-site at all times and shall be made available to DEQ representatives upon request." The requested change is due to the baghouses rupturing bags when operated at the higher end of the manufacturer's recommended pressure drop range. A baghouse O&M Manual was submitted to DEQ on March 29, 2000 that specified operating the baghouse between ½" and 2½" of pressure drop. No other permit terms were reviewed or modified.

FACILITY DESCRIPTION

The processes at the facility remain unchanged. Process descriptions can be found in previously issued technical memorandums that support the issuance of permits for this facility and in the OP application materials dated February 23, 1996.

SUMMARY OF EVENTS

On April 3, 2000, DEQ received an application for a Tier II OP amendment from Woodgrain Millwork. On May 18, 2000, the application was declared complete.

DISCUSSION

1. Emission Estimates

Emission limits remain unchanged for this amendment.

2. Modeling

Because emissions are not increasing, modeling is not required.

3. Area Classification

The Woodgrain Millwork - Nampa facility is located at 1201 W. Karcher Road, Nampa. It is in Air Quality Control Region (AQCR) 64 and Zone 11. The area is classified as attainment or unclassifiable for all federal and state criteria air pollutants (i.e., PM₁₀, CO, NO_x, VOCs, and SO_x).

4. Facility Classification

The facility is not a designated facility as defined in IDAPA 16.01.01.006.27. The facility is classified as an A2 source because the actual emissions of any criteria pollutant is less than 100 tons per year. The standard industrial classification (SIC) code for this facility is 2431.

5. Regulatory Review

This OP is subject to the following permitting requirements:

a.	<u>IDAPA 16.01.01.401</u>	Tier II Operating Permit
b.	<u>IDAPA 16.01.01.403</u>	Permit Requirements for Tier II Sources
c.	<u>IDAPA 16.01.01.404.01(c)</u>	Opportunity for Public Comment
d.	<u>IDAPA 16.01.01.404.04</u>	Authority to Revise or Renew Operating Permits
e.	<u>IDAPA 16.01.01.406</u>	Obligation to Comply
f.	<u>IDAPA 16.01.01.470</u>	Permit Application Fees for Tier II Permits
g.	<u>IDAPA 16.01.01.625</u>	Visible Emission Limitation
h.	<u>IDAPA 16.01.01.650</u>	General Rules for the Control of Fugitive Dust

FEES

Fees apply to this facility in accordance with IDAPA 16.01.01.470. The facility is subject to permit application fees for this revised Tier II OP of \$500.

RECOMMENDATIONS

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue an amended Tier II OP to Woodgrain Millwork for their Nampa facility. Staff members have notified the facility in writing of the required Tier II application fee of five hundred dollars (\$500.00). The permit will be issued upon receipt of the fee.

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cc: P. Rayne
C. Thomas
S. West, Boise Regional Office
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